

EXHIBIT

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**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHN DOE #11,

Plaintiff,

v.

**WILLIAM B. LEE, in his official
capacity as Governor of the State of
Tennessee, and**

**DAVID B. RAUSCH, in his official
capacity as Director of the Tennessee
Bureau of Investigation,**

Defendants.

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Case Nos. 3:22-cv-00338
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DECLARATION OF HENRIETTA KERLEY

I, **HENRIETTA KERLEY**, state as follows:

1. My name is Henrietta Kerley and I am over the age of eighteen (18), of sound mind, and competent to make the statements contained in this declaration.

2. I am a sex offender compliance officer with the Cumberland County Sheriff's Office.

3. I have been employed with the Cumberland County Sheriff's Office for the past 29 years.

4. For the past 17 years, I have been responsible for registering sexual offenders and investigating registry violations.

5. There are benefits to the Tennessee sex offender registry. Officers and Investigators are aware of the offenders on the registry. When doing residential checks on the offenders, officers become aware of where they live, work, or go to school. When our department takes a report, sexual in nature, having the registry available to the Investigators may give the Investigating Officer insight to the MO of the offender.

6. The sex offender registry has helped my community. The community loves having the ability to check for offenders in their neighborhoods. This office is constantly getting praise from the citizens of this county for doing their part to keep the communities safe. The SOR Office receives phone calls of people moving into our county or even changing neighborhoods within the county with questions about Sexual Offenders in the area. The SOR has been a great asset to our County and State. Community awareness to me is a great asset in keeping our citizens safe.

7. I absolutely believe there is a reduction in crime because sex offenders are required to register. I believe that some offenders are opportunist. When an offender knows they are required to register, have periodic residential verification, and laws to abide by that are enforced it narrows opportunity for the offender. Therefore, I believe crime is reduced.

8. My community is definitely safer because of the public registry. The Tennessee sex offender registry not only educates the public but raises public awareness to sexual crimes and convicted offenders within their communities. The residents of this county want to know if there are registered offenders in their neighborhood.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Henrietta Kerley
Henrietta Kerley

5-16-2022
May 16, 2022